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7 Attorneys for Defendant
MEXICANA AIRLINES

8
9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA

11 MARICELA RAMIREZ,

12 Plaintiff,

13 vs.

14 UNITED AIRLINES, INC., a foreign
15 corporation; COMPANIA MEXICANA
DE AVIACION, S.A. DE C.V., a
16 Mexican corporation doing business as
MEXICANA AIRLINES (an assumed
17 business name), and JOHN DOES 1
THROUGH 10,

18 Defendants.
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Case No. C 05 4065 WHA

STIPULATION FOR PROTECTIVE
ORDER AND ~~PROPOSED~~
ORDER THEREON

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21 Plaintiff MARICELA RAMIREZ and defendant MEXICANA AIRLINES
22 (hereinafter "MEXICANA"), through their respective attorneys of record herein,
23 stipulate as follows:

24
25 Recitals

26 Whereas, Plaintiff has requested that MEXICANA produce a copy of the
27 passenger list for Mexicana flight No. 905 on October 9, 2003 (the "Passenger
28 List");

1 Whereas, 14 C.F.R. Part 243 prohibits the use or dissemination of passenger
2 lists and contact information for commercial or marketing purposes and prohibits
3 the release of passengers lists and contact information to anyone other than the
4 United States State Department, the National Transportation Safety Board and the
5 United States Department of Transportation.

6 Stipulation

7 Plaintiff shall not disseminate, transmit or provide access to the Passenger
8 List other than to plaintiff's Pro Hac Vice attorney Thomas J. Flaherty and the staff
9 employed by Thomas J. Flaherty and plaintiff's attorneys at the Law Offices of
10 Sterns & Walker and the staff employed by the Law Offices of Sterns & Walker;

11 Use of the Passenger List by plaintiff, plaintiff's Pro Hac Vice attorney
12 Thomas J. Flaherty and the staff employed by Thomas J. Flaherty and plaintiff's
13 attorneys at the Law Offices of Sterns & Walker and the staff employed by the
14 Law Offices of Sterns & Walker shall be permitted only for purposes of the
15 litigation in the above-referenced action;

16 Upon a resolution of the above-referenced action either in judgment,
17 dismissal, or settlement, plaintiff shall immediately destroy the Passenger List and
18 all copies or reproductions of the Passenger List.

19 Upon the destruction of the Passenger List, plaintiff's Pro Hac Vice attorney
20 Thomas J. Flaherty shall confirm in writing to MEXICANA, through its attorneys
21 at Condon & Forsyth, LLP, 1901 Avenue of the Stars, Suite 850, Los Angeles,
22 California 90067-6010, that the Passenger List and all copies or reproductions of
23 the Passenger List have been destroyed.

March

1 Dated: ~~February~~ *March* 13, 2006

THOMAS J. FLAHERTY ATTORNEY
AT LAW

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4 By: *Thomas J. Flaherty*
THOMAS J. FLAHERTY
Pro Hac Vice Attorney for Plaintiff
MARICELA RAMIREZ

March

6 Dated: ~~February~~ *March* 21, 2006

STERNS & WALKER

8
9 By: *Brenda D. Posada*
BRENDA D. POSADA
Attorneys for Plaintiff
MARICELA RAMIREZ

11 Dated: February 17, 2006

CONDON & FORSYTH LLP

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14 By: *Frank A. Silane*
FRANK A. SILANE
JENNIFER A. JOHNSTON
JAMES C. FINNEY
Attorneys for Defendant
MEXICANA AIRLINES

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19 Good Cause Appearing, IT IS SO ORDERED.



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23 Dated: March 23, 2006

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WILLIAM H. ALSUP
United States District Judge

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